TV Renewal – Modeling questions/additional information requests, responses, outstanding information
Resolute 2440-0005

ID #	Date Sent	Question/Comment	Due Date, response rec'd date	Response /Comments (i.e. adequate, more questions, etc.)
various	4/15/16	• Paper Machines 1 and 2 - The modeled emission rates appear to be lower than the estimated worst case. These units are permitted to burn natural gas, propane, or Kerosene. Kerosene is the worst fuel for PM10 and PM2.5 emissions. When totaling the coater dryer emissions with the Paper Machine's (since these use the same stack), for Paper Machine 1 the estimated emission rate is 0.934 lb PM10/hr and the modeled rate is 0.71 lb PM10/hr. • Paper Machine 3 – what other sources are being accounted for in the modeled emissions for the Paper Machine 3? Modeled rates are shown for SO2, NOx and CO. The paper machine by itself does not have these emissions. Are the emissions from this source being combined with emissions from the Air Flotation Dryer, Infrared Dryer, and Hot Oil System? But the permit shows separate stack for these 4 sources? • Paper Machines 1 and 2 – the modeled CO values of 4.01/5.188 lb/hr, respectively, are lower than the calculated values of 4.03/5.38 lb/hr. • Recovery Furnace No. 2 – modeled SO2 rate of 112.7 is lower than the calculated value of 112.8 lb/hr. • Power Boiler – the modeled NOx rate of 104.76 is lower than the calculated rate of 107.16 lb/hr • In the modeling summary date 6/12/14, emission rates for the Combination Boilers No. 1 and No. 2 were revised based on the modifications that were done to comply with Boiler MACT. Those rates are in parentheses and are to be incorporated at next modeling. However, the calculated rates for PM10, PM2.5, NOx, and CO are higher than those rates. • None of the Lead emissions have been modeled. • No PM2.5 emissions have been modeled. • Should the emissions from the Chlorine Dioxide plant be modeled? None show up on the modeling summary.	4/29/16	• The total facility PM_{10} emissions are lower than the total modeled PM_{10} emission rate. The total facility impacts for PM_{10} are well below the air quality standards and the minor difference in PM_{10} emission rates will not alter the compliance status of the Catawba Mill. The modeled PM_{10} emission rates reflected only the coater combustion emissions since no emission factors were published for paper production at the time of the modeling submittal. Since that time, PM1 has also been shutdown. • Paper machine #3 has many stacks and is modeled as an area source. The air flotation dryer, infrared dryer, and hot oil system are all integral parts of paper machine #3. • The total facility CO emissions are lower than the total modeled CO emission rate. The total facility impacts for CO are well below the air quality standards and the minor difference in CO emission rates will not alter the compliance status of the Catawba Mill. • The total facility SO_2 emissions are lower than the total modeled SO_2 emission rate. The total facility impacts for SO_2 are well below the air quality standards and the minor difference in SO_2 emission rates will not alter the compliance status of the Catawba Mill. • The total facility NO_X emissions are lower than the total modeled NO_X emission rate. The total facility impacts for NO_X are well below the air quality standards and the minor difference in NO_X emission rates will

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				not alter the compliance status of the Catawba Mill. • No modeling was submitted as part of Boiler MACT compliance, because the emission rates were lower. The modeling summary should be based on the emission rates in the most recent modeling submittal. • Lead emissions were modeled for the initial Title V permit and included in previous modeling summaries. • $PM_{2.5}$ modeling has not been required previously following Department policy. • There are no criteria pollutant emissions from the ClO_2 Plant.